

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Capital Rail Constructors

Plaintiff,

v.

Western Surety Company

Defendant.

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Case No. 8:16-cv-01345

MOTION FOR ADMISSION PRO HAC VICE

I, Kathleen A. Mullen, am a member in good standing of the bar of this Court. I am moving the admission of Joseph T. Imperiale to appear pro hac vice in this case as counsel for Midasco, LLC and ImesApl, LLC.

We certify that:

1. The proposed admittee is not a member of the Maryland bar and does not maintain any law office in Maryland
2. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts:

State Court & Date of Admission	U.S. Court & Date of Admission
<u>Pennsylvania, 2004</u>	<u>E.D. Pennsylvania, 2004</u>
<u>New Jersey, 2004</u>	<u>District of New Jersey, 2005</u>
<u></u>	<u>U.S. Court of Federal Claims, 2008</u>
<u></u>	<u></u>

3. During the twelve months immediately preceding this motion, the proposed admittee has been admitted pro hac vice in this Court 0 times.
4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction. (NOTE: If the proposed admittee has been disbarred, suspended, or denied admission to practice law in any jurisdiction, then he/she must submit a statement fully explaining all relevant facts.)
5. The proposed admittee is familiar with the Maryland Lawyers' Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court, and understands he/she shall be subject to the disciplinary jurisdiction of this Court.

6. The proposed admittee understands admission pro hac vice is for this case only and does not constitute formal admission to the bar of this Court.
7. Either the undersigned movant or Kathleen A. Mullen,
is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.
8. **The \$100.00 fee for admission pro hac vice accompanies this motion.**
9. We hereby certify under penalties of perjury that the foregoing statements are true and correct.

MOVANT

s/ Kathleen A. Mullen

Signature

Kathleen A. Mullen

Printed name and bar number

Pepper Hamilton LLP

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PROPOSED ADMITTEE


Signature

Joseph T. Imperiale

Printed name and bar number

Pepper Hamilton LLP

Office name

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CERTIFICATE OF SERVICE

I, Kathleen A. Mullen, hereby certify that on August 21, 2017, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice was filed electronically and therefore served via electronic notice by the Court's CM/ECF system upon the following:

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